

June 26, 2024

VIA ECF

Hon. Katherine Polk Failla
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 618
Southern District of New York
New York, NY 10007

MEMO ENDORSED

**Re: Hansen, et al. v. Gerson Lehrman Group, Inc., 24 Civ. 2194
Whelan, Jr., et al. v. Gerson Lehrman Group, Inc., 24 Civ. 2202
Knapp, et al. v. Gerson Lehrman Group, Inc., 24 Civ. 2229
Miller, et al. v. Gerson Lehrman Group, Inc., 24 Civ. 2725**

Dear Judge Failla,

Our firm represents Plaintiffs in this consolidated class action. We respectfully submit this consent motion pursuant to Your Honor's Individual Rules of Practice 2(C)(i) to request a thirty-day extension of time to file the consolidated amended complaint in this matter and a corresponding extension of time for Defendant to answer, move, or otherwise respond to the consolidated amended complaint.

On May 24, 2024, the Court entered an order consolidating four related actions and setting the deadline to file a consolidated amended class action complaint as June 28, 2024. Doc. 14. The order further set Defendant's deadline to answer, move, or otherwise respond to the consolidated amended complaint as August 16, 2024, noting that if Defendant filed a pre-motion letter, the Court would hold a pre-motion conference and set a briefing schedule at that time.

Plaintiffs request a thirty-day extension of time to file the consolidated amended class action complaint, to July 29, 2024, to allow them to conduct additional factual and legal investigation into Plaintiffs' claims that will be asserted in the consolidated amended complaint. Plaintiffs further request a corresponding extension of time for the deadline for Defendant to answer, move, or otherwise respond to the consolidated amended complaint be extended to September 16, 2024. This is the first request for an extension of these deadlines and the Defendant is unopposed to this request.

Should Your Honor have any questions or require additional information, please feel free to contact Plaintiffs' counsel.

Sincerely,

/s/ Mason A. Barney
Mason A. Barney

Siri | Glimstad

sirillp.com | NEW YORK | LOS ANGELES | MIAMI | PHOENIX
DETROIT | AUSTIN | CHARLOTTE | WASHINGTON D.C.

SIRI & GLIMSTAD LLP
mbarney@sirillp.com

Attorney for Plaintiffs

CC: All counsel of record via ECF

Application GRANTED. Plaintiffs shall file their consolidated amended complaint on or before **July 29, 2024**. Defendant shall answer, move, or otherwise respond to the consolidated amended complaint on or before **September 16, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 18.

Dated: June 27, 2024 SO ORDERED.
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE